September 2018

Purpose of training:

- Discuss policies and procedures for auditing DD providers who receive Medicaid funding
 - This includes all DD funded services (e.g. Day Habilitation, Infant Development, Residential Habilitation, etc.)

- In 2015 CMS conducted a review of the ND's Medicaid program integrity activities to assure the state's effectiveness in combating Medicaid fraud, waste, and abuse.
 - CMS found inadequate program integrity controls in many parts of the state's Medicaid program including;
 - not conducting fundamental program integrity activities,
 - lack of program integrity oversight of the Persons with Developmental Disabilities waiver program,
 - inadequate payment suspension procedures, and
 - insufficient provider enrollment practices and reporting.

- CMS report continue:
 - The division operates outside of the Medical Services umbrella and has an annual budget of approximately \$200 million (of which 52% is federally funded) that is paid to 35 provider entities who provide services to approximately 4200 beneficiaries.
 - CMS report stated North Dakota must incorporate fraud and abuse oversight into waiver programs of this size.

- CMS report continue:
 - Recommendations: To address the lack of program integrity controls in the Persons with Developmental Disabilities waiver programs, the state should:
 - Develop and implement policies and procedures to ensure program integrity oversight of the Persons with Developmental Disabilities waiver programs.
 - Establish processes among the PIU, the Developmental Disabilities
 Division, and the provider audit unit to coordinate the identification,
 investigation, and referral of suspected provider fraud in the Persons
 with Developmental Disabilities waiver programs to law enforcement.
 - Implement a compliance program that ensures providers, staff, and beneficiaries of the Persons with Developmental Disabilities waiver programs are trained how to report fraud.

Authority:

- The Division is required to follow federal requirements in conducting reviews and investigations.
- Requirements are found in 42 CFR, Chapter
 IV, Part 455 Program Integrity: Medicaid.
- Provider Integrity is governed by NDAC Chapter 75–02–05.

Importance of Provider Integrity:

- >Avoid unnecessary costs to the program due to fraud, waste, or abuse
- >Assure that eligible recipients receive quality and cost effective care

Importance of Fiscal Integrity Protections:

- > Essential to prevent improper payments
- >Vital to the continuation of services and programs
- > Reduces and prevents fraud, waste, and abuse
- Allows States to continue to support services/programs

- DD Division Staff Reporting Responsibilities
 - All DHS staff are required to report allegations of fraud and abuse immediately to the Fraud, Waste, and Abuse (FWA) Administrator
- Provider Obligations
 - Required to release information to the DD Division as part of the Medicaid Provider Agreement form. The form specifies that as a part of the provider agreement to participate in the Medicaid Program, the provider agrees to, upon reasonable request, release information needed to support the services billed to the Department.

DD Staff Reviewer Responsibilities:

- > Annually, or as needed, the DD Division will determine audit topics relative to the services authorized
- Review provider records/utilization reports to determine if services are being delivered according to accepted DD policy and procedures which includes:
 - Requesting, collecting and analyzing documentation from providers and recipients files for case reviews
 - Documenting findings
 - Coordinate and provide training for providers concerning billing/documentation
 - Determine corrective action in cases where appropriate
- > At the conclusion of the audit, submit a report to the DD provider and maintain a copy of the report in the provider's file

Provider Responsibilities:

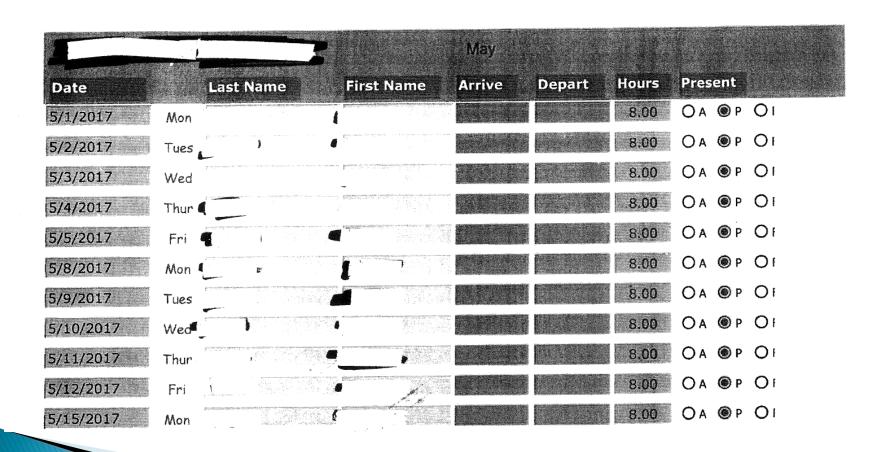
- Provide full disclosure of requested administrative, fiscal and program information within the requested timeframes. Documentation should support the service billed and include:
 - Date of service
 - Name of provider
 - Name of the Service being provided with in/out times for each service
 - Individual's name/Medicaid ID number
 - Staff who provided service (if using staff initials a legend of staff names must be provided)
 - Summary of tasks and activities performed during that time (daily rate providers can meet the requirement by one itemized list of routine tasks and a single entry every day)
 - The record should be written in clear language and without alterations
 - Respond to corrective actions as applicable within the requested timeframes.

- Day Support Audit reviewed 9,000 claims from 1/1/17-6/30/17 and approximately \$26 million.
- Documentation examples:

- Items blocked out for confidentiality:
 - Individual's name
- Items missing:
 - Dates of service should have daily attendance
 - Provider name
 - Name of service(s) provided
 - Medicaid number
 - In/out times for service(s) provided
 - Staff who provided service (if using staff initials a legend of staff names must be provided)
 - Documentation is not individualized shows many individuals being supported
 - Summary of tasks and activities performed during the day

	lan 47							TOTALS
	Jan-17 DAYS OF WEEK		2 thru 6	9 thru13	16 thru 20	23 thru 27	30 thrư 31	20/160
	DAYS OF WEEK	DD	9.25	8.75	8	12.5	1.75	40.25
1		DD	23	39.25	39	38.25	14.5	154
3		DD	24.25	39.75	32.25	39	15.75	151
4		DD	15	23.75	25.25	25.75	9.75	99.5
5		DD	14.5	25.25	21	25.25	10.25	96,25
6		DD	16	15.5	15.5	6	0	53
7	,	DD	18.75	28.5	29.75	29.75	12	118.75
8		DD	18.25	28.75	28	27.25	11.5	113.75
9	Change and	DD	9.25	18.75	18	13.5	7.75	67.25
10		DD	20,25	31.5	32	34.75	5.5	124
11		DD	6.5	12,25	13	13	0	44.75
12	•	DD	22.5	39.25	38.75	39	15.25	154.75

- Items blocked out for confidentiality:
 - Provider name
 - Individual's name
- Items missing:
 - Name of service(s) provided
 - In/out times for service(s) provided
 - Medicaid number
 - Staff who provided service (if using staff initials a legend of staff names must be provided)
 - Summary of tasks and activities performed during the day



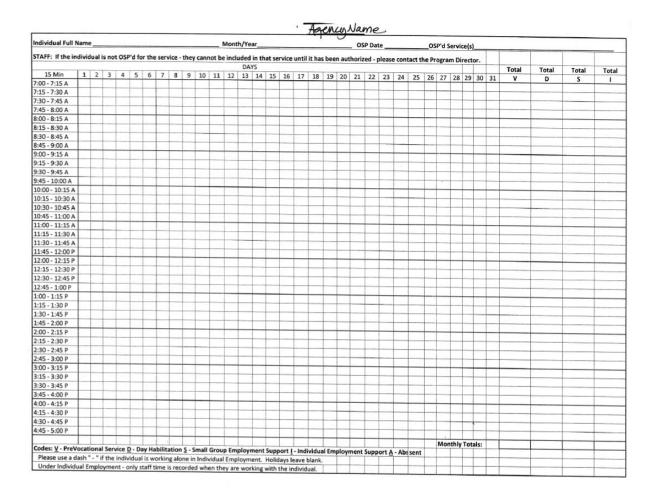
- Items missing:
 - Provider name
 - Name of the service(s) provided with in/out times for each service
 - Individual's Name/Medicaid number
 - Staff who provided service (if using staff initials a legend of staff names must be provided)

: Month:	June	20

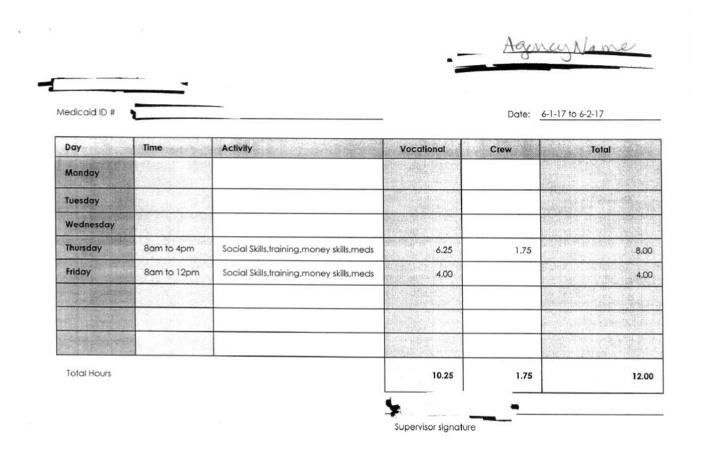
Use the tables below to keep track of the activities that are offered, and if the client participated or chose to just stay home.

	5	6	7	8	9
	Monday	Tuesday	Wednesday	Thursday	Friday
	Garden PISTS - Sarden Club	breinch, make cado bingo out outside art (imary herritage garden	Walk outside Pratericy-Cards	Mounalds-afford Brookfost Kirkwood-color Gotoway-lunch -VSA Oraget	Mall- Kukwbod Bans & Nuble VSA-Art- NNCh-Gatewi Hibrary Humand Society
Activities that client participated in/community involvement.	Gatelway Mall -color Library-dit-totalt Soratuma Park Lunch - garden Garden Proto - garden club MPL	Ant lunch @ gateway heritage	Volunteer Petsmart - clean cat cages Voille outside - honk & Petsmart Autoway - Earch TOBY - wattle come Ubrary - ct cake ound carols	Brokfast	Barris 3 Nota- Cracheticolor USA-ART Class Worth-Crotherian Norarly-Color Human Society- Volunteur With Cats

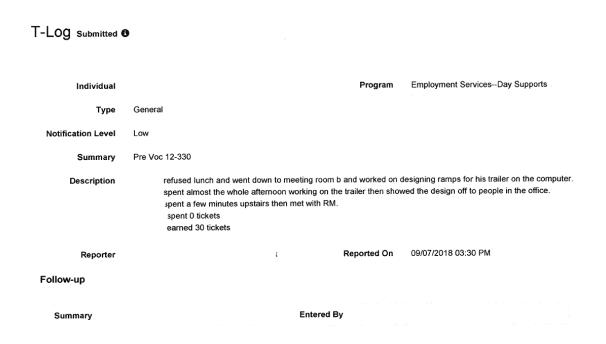
- Items blocked out for confidentiality:
 - Provider name
- Items missing:
 - Medicaid number
 - Staff who provided service (if using staff initials a legend of staff names must be provided)
 - Summary of tasks and activities performed during the day



- Items blocked out for confidentiality:
 - Provider name
 - Individual name
 - Medicaid number
- Items missing:
 - Staff who provided service (if using staff initials a legend of staff names must be provided)
 - More details in activity summary
 - In/out times for each service



- Items blocked out for confidentiality:
 - Individual's name



- Items blocked out for confidentiality:
 - Provider name
 - Individual name
 - Medicaid number
- Items missing:
 - Name of the Service being provided with in/out times for each service
 - A legend of staff names who provided services

Consumer_____ DAILY LOG Month/Year 4/2017

Date/filme	Comments//Activities	Spaffi
4-2-17 Gen Cr 4-3-17	Stace overed at 2pm to the was in norm. Quiet night overall Bus make a bathmen trip at 12 apm. Du house to 5 min to late a show at bascan. And water to 5 min took showed getting ready. Came out to eat practical at 740 and trook took and time and to have been and time and to have the water are hyginene checkist. Pocket thech seeks to have some how to be some that the same have to have parts that were diving that agreed to work to day some time. We to have at 8 am.	
13.17 1 2p-5p n C C	Dicked up at 12pm Pocket check ned done Deposit checks, spending & and grocen, shopping done worked Dutside. Showered at 2-30p. Tunch started laundly watched ty At 15p made popcom. Staff helped im Melt hight amount of butter.	

- Items blocked out for confidentiality:
 - Provider name
 - Individual name
 - Medicaid number
 - Staff name
- Items missing:
 - Name of the Service being provided with in/out times for each service

Agency Name

Daily Service Log

Person Supported:

Date: MAY 2017

Shift Time	AM/ PM	Activities Completed	Supports Provided (Incl. #)	Training Obj. worked on (Incl#)	Comments	Staff Name
5/1	8am 4pm	Completed personal Cares. Completed all medications. Current Events reviewed. Reviewed the Job openings in the paper. Filled Medication planner. Completed Laundry. Reviewed the Right of the week & Self Advocacy. Exercised. Deep cleaned Kitchen. Menu planning, Made grocery list, Completed grocery shopping. Worked on Social Stories for the Blue Moose. Completed meal prep and clean-up.	S-1,S-3,S- 4,S-5,S-6, S-7	6-A	Daily Score +3	

Roy's Day Documented 3 Ways

- Example 1
- Example 2
- Example 3

Roy's Day Example 1

Individual Name: Roy Rogers Agency: XYZ

Medicaid #: __123-45-6789_______

Date: _9/3/18-9/7/18_______

Day	Day Habilitation	Prevocational Services	Small Group Employment Support	Individual Employment Support	Total	Staff
Monday (9/3/18)	8:15A-12P; Roy went to the thrift store to volunteer; folding clothes and organizing shelves. He then went to McDonalds for lunch. 3:45P-4P; Roy returned to day program site and listened to music until his ride came. (4 hours; 16 units)	0	12P-3:45P; Roy went to his group job at ABC where he cleaned the bathrooms and vacuumed the offices. (3hr/45min; 15 units)	0	7 hr. 45min; 31 units	ZZ
Tuesday (9/4/18)	1:45p – 4:00p; Mom dropped him off at 1:45p. Roy wasn't feeling well so relaxed and listened to music the rest of the afternoon (2hrs/15 min; 9 units)	8:00a – 11:15a; Roy started off in the kitchen preparing lunches for a workshop. He had an early lunch due to a Dr. Appointment @ 11:30a. Transit came to pick him up at 11:15a where he met his mom (3hr/15 min; 13 units)	0	0	5 <u>hrs</u> 30 min; 22 units	CS ZZ
Wednesday (9/5/18)			12p – 3:45p; Lawn crew staff picked Roy up at the grocery store and they had lunch at the park. Then went to the first site to work on contracted lawns the rest of the afternoon. Roy emptied the full lawn bags into the cans and weed-whacked.	8a – 12p; Worked at the grocery store stocking shelves, bringing in carts, and sweeping floors (4hrs; 16 units)	7hrs/45min; 31 units	CS RP

Roy's Day Example 1 Continued

Day	Day Habilitation	Prevocational Services	Small Group Employment	Individual Employment	Total	Staff
			Support	Support		
			Got back just in time for Transit to take him home.			
			(3hrs/45 min; 15 units)			
Thursday (9/6/18)	11:15a – 2:30p; Roy came back to the building had lunch and decided to partake in BINGO. (3hrs/15 mins; 13 units)	2:30p – 4:00p; Roy decided to finish his day out peeling potatoes (1hr/30 mins; 6 units)	10a – 11:15a; Lawn crew staff picked him up to work on contracted lawns. Roy was mowing lawns until they got rained out. (1hr/15 min; 5 units)	8a – 10a; Worked at the grocery store learning cashier duties (2hrs; 8 units)	8hrs; 32 units	ZZ CS RP
Friday (9/7/18)	0 Went home with parents. Roy was looking forward to a relaxing weekend after his busy week	0	0	0	0	ZZ
Total Hours:	9hrs/30 min; 38units	4hrs/45mins; 19 units	8hrs/45 min; 35 units	6hrs; 24 units	29hrs; 116 units	ZZ

Staff Name and Initials

Ziggy Ziegler - ZZ

Charlie Starkist - CS

Roy's Day Example 2

Day In/out time Summary of activities Day Small Group Individual Total Staff Prevocational Habilitation Services Employment Employment Support Support 0 12P-3:45P 7 hr. ZZ Monday 8:15A-4P In the morning Roy went 8:15A-12P, 0 (9/3/18)to the thrift store to 3:45P-4P 45min; (3hr/45min; volunteer; folding clothes (4 hours; 15 units) 31 units and organizing shelves. 16 units) Roy went to McDonalds for lunch. In the afternoon Roy went to his group job at ABC where he cleaned the bathrooms and vacuumed the offices. Roy returned to day program site and listened to music until his ride came. Tuesday 8a-4p Roy started off in the 1:45p -8:00a -0 0 5 hrs CS (9/4/18)kitchen preparing lunches 4:00p 11:15a 30 min; ZZ for a workshop. He had (3hr/15 min; (2hrs/15 22 units an early lunch due to a Dr. min; 9 13 units) Appointment @ 11:30a. units) Transit came to pick him up at 11:15a. Mom met him at the appointment. After the Dr. appointment, mom took Roy to Dairy Queen. Mom dropped him off again @ 1:45p. Roy

Staff Name and Initials

Roy's Day Example 2 Continued

Day	In/out time	Summary of activities	Day Habilitation	Prevocational Services	Small Group Employment	Individual Employment	Total	Staff
					Support	Support		
		they got rained out at						
		11:15a. Roy came back to						
		the building had lunch						
		and decided to partake in						
		BINGO. That ended						
		around 2:30 so Roy						
		decided to finish his day						
		out peeling potatoes						
Friday	Absent	Went home with parents.	0	0	0	0	0	ZZ
(9/7/18)		Roy was looking forward						
		to a relaxing weekend						
		after his busy week						
Total Hours:			9hrs/30	4hrs/45mins;	8hrs/45	6hrs; 24	29hrs; 116	ZZ
			min;	19 units	min; 35	units	units	
			38units		units			

Roy's Day Example 3

А	В	С	D	E	F	G	Н	1	J	K	L	М	N	0	Р	Q	R	S	T	U	V	V	X	Y	Z	AA	AB	AC
XYZ																												
456 Boa																												
Monopo	iy, USA																											
Attenda			Roy Ro																									
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8:00					T				1	×							1			X		-			1			×
8:15	×						ng Roy we			×			Roy st	arted off	in the ki	tchen				×		ed at the		store				×
8:30	×						re to volu			×			prepai	ring lunc	hes for a					×	from 8	3a – 12p s	stocking					X
8:45	×				fold	ing cloth	es and org	ganizing		×			works	hop. He	had an e	arlv				×	shelve	s, bringir	ng in cart	s, and				×
9:00	×				she	ves. Roy	went to	_		×				due to a		1				×	sweep	ing the fl	loor. Law	/n				Х
9:15	×				McI	onalds f	or lunch. I	In the		×										×		taff picke						×
9:30	×						y went to			×					@ 11:30a					×		ad lunch						×
9:45	×						ABC wher			×					o pick hin					×		ent to wo						×
10:00	×						oathroom:			×			11:15	a. Mom r	net him a	at the				×		cted law		set of			X	
10:15	×						e offices.			×			appoir	ntment.	After the	Dr.				×		ternoon.					X	
10:30	×									×					mom too					×							X	
10:45	X						lay progra			×				ry Queer		K IIO y				×		II lawn ba					X	
11:00	×				_		to music ι	until his		×						_				×		eed wha					X	
11:15	X				ride	came.									ff again (X		ust in tim		ınsit to	X			
11:30	×				_								1:45p.	Roy was	n't feelir	ng well				×	take h	im home			X			
11:45	X				_								so rela	xed and	listened	to				X					X			
12:00			×		_								music	the rest	of the				X		-				X			
12:15 12:30		_	×		_								aftern	oon					×		-				X			
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ours	7.75	. accurs							9.50								7.75	iidais							8.00			

Roy's Day Example 3

Thursda	21.1				Friday										
DH	PV	SG	IE	Activity Summary	DH	PV	SG	IE	Activity Summary						
			×												
			X	Worked at the grocery store					Went home with parents.						
			X	from 8a – 10a learning cashier					Roy was looking forward to a						
			×	duties. Lawn crew staff					relaxing weekend after his						
			×	picked him up to work on					busy week						
			×	contracted lawns. Roy was											
			X	mowing lawns until they got											
		×	^	rained out at 11:15a. Roy											
		×		came back to the building had											
		×		lunch and decided to partake											
		×		in BINGO. That ended around											
		×		2:30 so Roy decided to finish											
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										Units	38	19	35	24	116
										Hours		4.75	8.75	6	29
13	6	5	8		0	0	0	0		Total '	Weekly nits	116	00		
8:00	Initials				00:00	Initials					Weekly urs	29.00			

Guidelines to Conduct Reviews:

- Reviews are intended to provide assurance that services are being delivered in accordance to the individual's plan.
- The reviewer will use the most current Provider Integrity Manual to review the selected services including service documentation and payment records.

Audit:

- The audit is conducted in a three step process:
 - 1. Payment histories are reviewed to assure the client had a plan authorizing the specific service. Payments on the entire history are reviewed to look for inaccurate coding, overbilling for a specific service, odd service combinations, and other unusual issues.
 - 2. Desk audits will be completed unless there is a specific concern that becomes evident during a review.
 - 3. Over billing or over payments may be corrected by an adjustment or repayment and the provider is sent a letter outlining the process.

DD Provider Integrity Manual can be found on the DHS website.

http://www.nd.gov/dhs/services/disabilities/docs/ddprovider-integrity-manual.pdf

Questions

